

April 18, 2005

Office of Special Nutritionals (HFS-450) Center for Food Safety and Applied Nutrition Food and Drug Administration 200 C Street SW 20204 Washington, DC

Dear Food and Drug Administration,

Herbalist & Alchemist, Inc., manufacturer, located at 51 South Wandling Ave., Washington, NJ 07882 is marketing the following product:

Phytodent

containing: witch hazel

spilanthes

myrrh

goldenseal

peppermint essential oil

calendula

cinnamon essential oil

thyme

bearing a structure/function claim of: Promotes Healthy Gums

We have substantiation to support this claim.

Sincerely,

975 0162 LET 16118

William Hoover

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